

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-against-

CARRILLO HUETTEL LLP, LUIS J. CARRILLO,  
WADE D. HUETTEL, GIBRALTAR GLOBAL  
SECURITIES, WARREN DAVIS, JOHN B. KIRK,  
BENJAMIN T. KIRK, DYLAN L. BOYLE, JAMES  
K. HINTON JR., LUNIEL DE BEER, JOEL P.  
FRANKLIN, PACIFIC BLUE ENERGY  
CORPORATION, TRADESHOW MARKETING  
COMPANY LTD, and DR. LUIS CARRILLO,

Defendants.

-and-

DR. LUIS CARRILLO,

Relief Defendant.

No. 13-CV-1735 (BGD)

**DECLARATION**  
**OF WILLIAM H. DEVANEY**

I, WILLIAM H. DEVANEY, declare under penalty of perjury that the information set forth below is true and correct:

1. I am a partner in the law office of Venable LLP in New York, New York. Venable LLP represents Defendant Carrillo Huettel LLP ("CH LLP") in the above-captioned matter. I am familiar with the facts and circumstances related to the above-captioned matter and make the assertions stated herein.
2. A true and correct copy of the SEC's Complaint, dated March 15, 2013, is attached hereto as Exhibit A.
3. A true and correct copy of the Memorandum of Law in Support of Defendant Wade D. Huettel's Motion to Dismiss is attached hereto as Exhibit B.

4. A true and correct copy of an opinion letter to Scottsdale Capital Advisors dated November 23, 2009 is attached hereto as Exhibit C.

5. A true and correct copy of an opinion letter to the Depository Trust Company dated March 2, 2010 is attached hereto as Exhibit D.

6. A true and correct copy of an opinion letter to Scottsdale Capital Advisors dated April 21, 2010 is attached hereto as Exhibit E.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
June 28, 2013

/s/  
William H. Devaney